

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

JANE DOE, on behalf of JOHN DOE, her
minor child,

Plaintiff,

v.

MARTY SMALL, SR., in his official
capacity as Mayor of Atlantic City, New
Jersey, and individually,

LA'QUETTA SMALL-FRAZIER, in her
official capacity as Former Principal of
Pennsylvania Avenue School, and
individually,

BARRY CALDWELL, in his official
capacity as current Superintendent of the
Atlantic City School District,

PAUL A. SPAVENTA, in his official
capacity as former Interim Superintendent of
the Atlantic City School District,

ATLANTIC CITY BOARD OF
EDUCATION, a public entity, and

KAYAN AHMED FRAZIER, an individual,

Defendants.

Civil Action No.: 1:21-cv-11189

**NOTICE OF MOTION
FOR *PRO HAC VICE*
ADMISSION OF
ROOK E. RINGER, ESQ.**

TO:

Marty Small, Sr.
City of Atlantic City, New Jersey
Office of the Mayor
1301 Bacharach Boulevard
Atlantic City, New Jersey 08401
Defendant

Barry Caldwell
Office of the Superintendent
1300 Atlantic Avenue
Atlantic City, NJ 08401
Defendant

La'Quetta Small
116 N. Presbyterian Avenue
Atlantic City, New Jersey 08401
Defendant

Paul A. Spaventa
22415 Arbor Circle
Milton, DE 19968
Defendant

Atlantic City Board of Education
1300 Atlantic Avenue
Atlantic City, NJ 08401
Defendant

Kayan Ahmed Frazier
Inmate Registration No.: 72688-050
Federal Detention Center – Philadelphia
700 Arch Street
Philadelphia, Pennsylvania 19106
Defendant

PLEASE TAKE NOTICE that the undersigned will apply to the above-named Court at the Mitchell H. Cohen Building & U.S. Courthouse located at 4th & Cooper Streets, Camden, New Jersey 08101 on Monday, August 2, 2021 at 9:00a.m. or as soon thereafter as may be heard, for an Order Allowing for the Admission *Pro Hac Vice* of Rook E. Ringer, Esquire, pursuant to Fed. R. Civ. P. 78, and L. Civ. R. 101.1(c)(1).

PLEASE TAKE FURTHER NOTICE that in support of this application, Plaintiff's Counsel shall rely upon the Certification of Terrell A. Ratliff, Esquire, and the Certification of Rook E. Ringer, Esquire, as attached.

Pursuant to Fed. R. Civ. P. 78, the undersigned requests that this matter be submitted to the Court for ruling on the papers unless opposition is filed, in which case, oral argument is specifically requested. A proposed form of Order is annexed hereto.

Dated: July 1, 2021

LENTO LAW GROUP, P.C.

s/ *Terrell A. Ratliff*

TERRELL A. RATLIFF, ESQUIRE

I certify that the within Notice of Motion and all supporting documents have been filed and served in the manner and within the time limits prescribed by the Rules.

Dated: July 1, 2021

LENTO LAW GROUP, P.C.

s/ *Terrell A. Ratliff*

TERRELL A. RATLIFF, ESQUIRE

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KAYAN AHMED FRAZIER, an individual,

Defendants.

Civil Action No.: 1:21-cv-11189

**CERTIFICATION OF
TERRELL A. RATLIFF, ESQ.
IN SUPPORT OF MOTION FOR
PRO HAC VICE ADMISSION OF
ROOK E. RINGER, ESQ.**

I, Terrell A. Ratliff, Esquire, of full age, being duly sworn, according to law, upon my oath do hereby depose and say:

1. I am an attorney-at-law of the State of New Jersey and am an associate with the Lento Law Group, P.C., attorneys for Plaintiff, JANE DOE on behalf of JOHN DOE, her minor child, in the above-captioned matter. As such, I am fully familiar with the facts contained herein.

2. I, Terrell A. Ratliff, Esq., a member of the bar of this Court, hereby respectfully move for the Admission *Pro Hacer Vice* of Rook E. Ringer, Esquire.

3. Rook E. Ringer is a managing attorney of the Lento Law Group, P.C.'s Florida office, located at 222 San Marco Avenue - Suite C, St. Augustine, Florida 32084, and is a member in good standing of the bar of the State of Florida, as well as the Federal Bar.

4. Ms. Ringer, as a fellow attorney of Lento Law Group, P.C., Counsel for the Plaintiff, is fully familiar with facts of this matter and is experienced with handling the legal issues relating to this lawsuit.

5. Pursuant to L. Civ. R. 101.1(c), I, Terrell A. Ratliff, Esq., the attorney of record in this matter, understand that I will continue to serve as counsel of record for the Plaintiff herein, and will sign all pleadings, briefs, stipulations, and other papers filed with the Court, and will participate in all proceedings. Further, I agree to promptly notify the attorney admitted *pro hac vice* of the receipt of all notices, orders, and pleadings.

6. Pursuant to L. Civ. R. 101.1(c), I, Terrell A. Ratliff, Esq., further understand that I shall be held responsible for the conduct of this case and for the conduct of the attorney admitted *pro hac vice*.

7. Ms. Ringer agrees to submit to all rules of practice and procedure for this Court, and will work closely with the attorney of record, Terrell A. Ratliff, Esq., in connection with this case. *See* Certification of Rook E. Ringer, Esq., filed concurrently herewith.

8. The fee required per L. Civ. R. 101.1(c)(2) and New Jersey Court Rule 1:28-2 will be provided to the New Jersey Lawyers' Fund for Client Protection within twenty (20) days of the entry of the Court's Order admitting Ms. Ringer *pro hac vice*.

9. Further, payment in the amount of \$150.00 shall be made to the Clerk of the United States District Court as per L. Civ. R. 101.1(c)(3) within twenty (20) days of the entry of the Court's Order admitting Ms. Ringer *pro hac vice*.

10. WHEREFORE, I, Terrell A. Ratliff, Esq., counsel of record for the Plaintiff herein, respectfully request that this Honorable Court admit Rook E. Ringer, Esq., *pro hac vice* pursuant to the Federal and Local Rules of Civil Procedure as aforesaid.

I hereby certify that the foregoing statements made by me are true to the best of my knowledge.

I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Dated: July 1, 2021

LENTO LAW GROUP, P.C.

s/ Terrell A. Ratliff

TERRELL A. RATLIFF, ESQUIRE
ATTORNEY ID: 017852001
3000 ATRIUM WAY – SUITE 200
MOUNT LAUREL, NEW JERSEY 08054
(T) (856) 652-2000
(F) (856) 375-1010
taratliff@lentolawgroup.com
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
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Defendants.

Civil Action No.: 1:21-cv-11189

**CERTIFICATION OF
ROOK E. RINGER, ESQ.
IN SUPPORT OF PLAINTIFF'S
MOTION FOR HER ADMISSION
*PRO HAC VICE***

I, Rook Elizabeth Ringer, Esquire, of full age, being duly sworn, according to law, upon my oath do hereby depose and say:

1. I am an attorney-at-law of the State of Florida and am an associate with the Lento Law Group, P.C., attorneys for Plaintiff, JANE DOE on behalf of JOHN DOE, her minor child, in the above-captioned matter. As such, I am fully familiar with the facts contained herein.

2. I submit this Certification in support of the application of the Plaintiff for my admission *pro hac vice*, as Co-Counsel for the Plaintiff along with Terrell A. Ratliff, Plaintiff's Counsel of Record in this matter.

3. I am a member in good standing of the bar in the State of Florida since 2019.

4. Additionally, I am a member in good standing of the Federal Bar of Arkansas (Eastern & Western District), Texas (Western District), Florida (Middle & Southern Districts), as well as the Fifth Circuit Court of Appeals, since 2020.

5. The name and address of the officials or offices that maintain the roll of such members of the bar listed above are as follows:

STATE:

State Bar of Florida
Membership Department
651 E. Jefferson Street
Tallahassee, Florida 32399-2300
(850) 561-5600

FEDERAL:

United States District Court, Eastern District of Arkansas
Membership Department
500 West Capitol Avenue
Little Rock, Arkansas 72201
(501) 604-5351

United States District Court, Western District of Arkansas
Membership Department
30 South 6th Street
Fort Smith, Arkansas 72901-2437
(479) 783-6833

United States District Court, Western District of Texas
Membership Department
501 West Fifth Street, Suite 1100
Austin, Texas 78701
(512) 916-5896

United States District Court, Middle District of Florida
Membership Department
2110 First Street
Fort Myers, Florida 33901
(239) 461-2000

United States District Court, Southern District of Florida
Membership Department
400 North Miami Avenue
Miami, FL 33128
(305) 523-5100

6. No disciplinary charges have been filed against me in any jurisdiction, nor has any discipline previously been imposed against me, ever.

7. Pursuant to L. Civ. R. 101.1(c)(1), I understand that I am required to promptly advise the Court of the disposition of any pending disciplinary charges, or the institution of new charges.

8. I further understand that I shall be bound by the Federal and Local Rules and am within the disciplinary jurisdiction of this Court throughout the period of my admission *pro hac vice*.

9. I agree to submit to all rules of practice and procedure for this Court, and will work closely with the attorney of record, Terrell A. Ratliff, Esq., in connection with this case.

10. Annexed hereto as **EXHIBIT "A"** is a recent certificate evidencing my good standing with the State Bar of Florida.

11. The fee required per L. Civ. R. 101.1(c)(2) and New Jersey Court Rule 1:28-2 will be provided to the New Jersey Lawyers' Fund for Client Protection within twenty (20) days of the entry of the Court's Order admitting me *pro hac vice*.

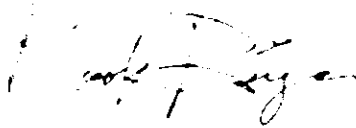
12. Further, payment in the amount of \$150.00 shall be made to the Clerk of the United States District Court as per L. Civ. R. 101.1(c)(3) within twenty (20) days of the entry of the Court's Order admitting me *pro hac vice*.

13. WHEREFORE, I, Rook E. Ringer, Esq., respectfully request that this Honorable Court admit me *pro hac vice* pursuant to the Federal and Local Rules of Civil Procedure as aforesaid.

I hereby certify that the foregoing statements made by me are true to the best of my knowledge. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Dated: July 1, 2021

LENTO LAW GROUP, P.C.



ROOK ELIZABETH RINGER, ESQUIRE
FL State Bar No. 1015698
222 San Marco Ave., Ste. C
St. Augustine, FL 32084 904.602.9400 (Office)
904.299.5400 (Fax)
reringer@lentolawgroup.com

EXHIBIT

“A”



The Florida Bar

651 East Jefferson Street
Tallahassee, FL 32399-2300

Joshua E. Doyle
Executive Director

850/561-5600
www.FLORIDABAR.org

State of Florida)

County of Leon)

In Re: 1015698
Rook Elizabeth Ringer
Lento Law Group, P.A.
222 San Marco Ave Ste C
St Augustine, FL 32084-2786

I CERTIFY THE FOLLOWING:

I am the custodian of membership records of The Florida Bar.

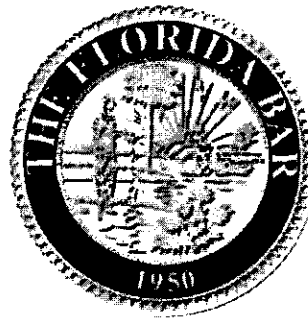
Membership records of The Florida Bar indicate that The Florida Bar member listed above was admitted to practice law in the state of Florida on **April 29, 2019**.

The Florida Bar member above is an active member in good standing of The Florida Bar who is eligible to practice law in the state of Florida.

Dated this 21st day of **June, 2021**.

Cynthia B. Jackson, CFO
Administration Division
The Florida Bar

PG:R10
CTM-139504



UNITED STATES DISTRICT COURT
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Defendants.

Civil Action No.: 1:21-cv-11189

**ORDER ADMITTING
ROOK E. RINGER, ESQ.
PRO HAC VICE**

This matter having been brought before the Court by Terrell A. Ratliff, Esq., counsel for JANE DOE, the Plaintiff herein on behalf of JOHN DOE, her minor child, on application for an Order allowing Rook E. Ringer, Esq., to appear and participate in this matter *pro hac vice*; and the Court having considered the moving papers; and this matter being considered pursuant to Fed. R. Civ. P. 78, and L. Civ. R. 101.1(c)(1); and for good cause shown;

IT IS on this _____ day of _____, 20____

ORDERED that Rook E. Ringer, Esq., a member in good standing of the Bar of the State of Florida, be permitted to appear *pro hac vice* in the above-captioned matter pursuant to L. Civ. R. 101.1(c)(1); and it is further

ORDERED that all pleadings, brief, and other papers filed with the Court shall be signed by a member or associate of the law firm of The Lento Law Group, P.C., attorneys of record for the Plaintiff, who is admitted to the Bar of this Court and who shall be held responsible for said papers, and for the conduct of the case, and who will be held responsible for the conduct of the attorney admitted hereby; and it is further

ORDERED that Rook E. Ringer, Esq., shall pay the annual fee to the New Jersey Lawyers' Fund for Client Protection in accordance with L. Civ. R. 101.1(c)(2) and New Jersey Court Rule 1:28-2 within twenty (20) days from the date of the entry of this Order, unless previously paid for the current calendar year; and it is further

ORDERED that Rook E. Ringer, Esq., shall make payment of \$150.00 to the Clerk of the United States District Court in accordance with L. Civ. R. 101.1(c)(3), as amended, within twenty (20) days from the date of the entry of this Order; and it is further

ORDERED that Rook E. Ringer, Esq., shall be bound by the Rules of the United States District Court for the District of New Jersey, including, but not limited to, the provisions of L. Civ. R. 103.1, Judicial Ethics and Professional Responsibility, and L. Civ. R. 104.1, Discipline of Attorneys; and it is further

ORDERED that Rook E. Ringer, Esq., shall be deemed to have agreed to take no fee in any tort case in excess of the New Jersey State Court Contingent Fee Rule, Rule 1:21-7, as amended; and it is further

ORDERED that Terrell A. Ratliff, Esq., may file a request, the form of which is available at the Court's website, with the Clerk of the Court for *pro hac vice* counsel to receive electronic notifications in this matter.

UNITED STATES MAGISTRATE JUDGE